

UNITED STATES DISTRICT COURT

for the

Western District of TexasUnited States of America
v.

Case No. SA:22-MJ-01008

JEROME DJETO*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 5, 2022 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 USC § 922(g)(1)

Felon In Possession of a Firearm

PENALTIES:

Up to 10 Years Imprisonment, \$250,000 Fine, 3 years supervised
release, and \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*Complainant's signature*Bryan Smith, DEA TFO*Printed name and title*

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: July 6, 2022City and state: San Antonio, Texas*Judge's signature*ELIZABETH S. CHESTNEY, U.S. MAGISTRATE JUDGE*Printed name and title*

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Affiant, Bryan Smith, am a Task Force Officer with the Drug Enforcement Administration (DEA) at the San Antonio District Office and have been so since 2012. I have been employed with the Bexar County Sheriff's Office since February 2003. In 2010, I was assigned to the Bexar County Narcotics Unit and in 2012 to the present, I have been assigned to the DEA San Antonio District Office as a Task Force Officer. I am a Bexar County Deputy Sheriff who has been deputized by the Drug Enforcement Administration as Task Force Officer which allows me to enforce state and federal laws primarily pertaining to narcotics related investigations and/or violations. I have made numerous State and federal arrests for narcotics related violations which have resulted in successful prosecutions.

I have worked on numerous investigations and assisted other federal, state, and local law enforcement agents and officers in their investigations on cases involving violations of Title 21, United States Code, Section 841(a)(1), the manufacture of, distribution of and possession with intent to distribute controlled substances and Title 21, United States Code, Section 846, conspiracy to commit the foregoing. Specifically, those investigations have focused on the manufacture and distribution of marijuana, methamphetamine, heroin, pharmaceutical pills, and cocaine. I am familiar with, and have participated in, all of the conventional investigative methods, including, but not limited to, electronic surveillance, visual surveillance, questioning of witnesses, search warrants, confidential informants, pen registers, trap and trace, and the use of undercover agents. Through my training and experience, I have become acquainted with the identification of various controlled substances. I have also become acquainted with the various methods used by individuals to possess, transport, and sell controlled substances in violation of federal law.

During the course of being a Narcotics Investigator and DEA Task Force Officer, I have participated in numerous investigations of illicit drug trafficking organizations. These investigations involved the use of confidential informants, wire and physical surveillance, telephone toll analysis, investigative interviews, and the service of search and arrest warrants. These investigations included the unlawful importation, possession with intent to distribute, and distribution of controlled substances, as well as the related laundering of monetary instruments, the conducting of monetary transactions involving the proceeds of specified unlawful activities, and conspiracies associated with criminal narcotics offenses, in violation of Title 21, United States Code, §§ 841(a)(1) and 846.

FACTS OF ARREST:

On July 5, 2022, members of DEA Task Force Group D54 and San Antonio Police HIDTA executed a search warrant at the residence of Jerome DJETO located at 6600 Fairdale Drive #44, San Antonio, Texas. Upon making entry in the residence, DJETO was detained in the living

room on the couch without incident. Next to DJETO, in plain view on top of an end table less than 1-2 feet away was a loaded Glock Model 23, .40 caliber semi-automatic pistol bearing serial# BUSK060. A pat down search of DJETO yielded the recovery of \$7,130.00 USC in his pants pocket. DJETO was found to be the sole occupant of the residence.

Once the residence was deemed secure, a canine was utilized to search the residence, where numerous narcotic “alerts” were indicated in the kitchen and bedroom areas.

SAPD Officer Nick Stromboe read DJETO his Miranda Rights while utilizing a body worn camera as witnessed by TFO Bryan Smith. DJETO stated he understood rights but refused to cooperate with law enforcement. DJETO did make a post Miranda statement on his own indicating he had gotten home, referring to the residence being searched, around midnight and fell asleep.

While searching the kitchen area inside a kitchen drawer, a clear gallon sized Ziploc bag containing numerous individual clear plastic bags each containing powder cocaine and crack cocaine was recovered. The alleged cocaine field tested positive for cocaine and had a total approximate gross weight of 172.1 grams.

As the search in the kitchen area continued, a grey plastic shopping bag was located in the pantry area. Upon opening the shopping bag, a clear gallon sized Ziploc bag containing numerous individual clear plastic bags each containing crystal methamphetamine was recovered. The alleged crystal methamphetamine field tested positive for methamphetamine and had a total approximate gross weight of 916.8 grams.

Also recovered in the kitchen area was a clear plastic sandwich bag containing numerous multi-colored pills with unknown markings alleged to be MDMA. The alleged MDMA field tested positive for methamphetamine and had an approximate gross weight of 94.7 grams. Also recovered was \$4,294.00 USC of alleged drug proceeds.

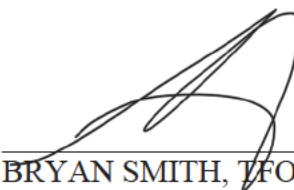
While searching the dining room area, a backpack was located partially open on the floor. Upon opening the backpack two (2) firearms were recovered. The firearms are identified as (1) Draco 7.62x39 semi-automatic pistol with the serial number removed/altered and (2) a loaded Ruger Model 57, 5.7 caliber, semi-automatic pistol bearing serial# 64156019.

As the search ensued in the bedroom, a box containing over 100 THC cartridges and numerous clear plastic sandwich bags each containing marijuana were recovered. The alleged marijuana had a total approximate gross weight 1,156 grams. Also recovered was a money counter, digital scales, a drug ledger, and packaging. These items are consistent with narcotics distribution. Also in the bedroom were numerous documents with Jerome DJETO’s name on them.

During the inspection of all three (3) recovered firearms, each are marked by the manufacturer (Glock, Ruger, & Cugir) as being manufactured outside the State of Texas which would indicate that all three (3) firearms traveled through interstate commerce prior to being in DJETO’s possession.

DJETO is a convicted felon and is prohibited from owning and/or possessing a firearm. The Defendant knew he had been previously convicted of a felony as he served prison sentences in the Texas Department of Criminal Justice for felony offenses.

DJETO was transported to the Bexar County Jail pending transfer to federal custody. All recovered evidence was inventoried and stored for safe keeping per agency policies.


BRYAN SMITH, TFO
DEA

Sworn to telephonically and signed electronically on July 6, 2022.


ELIZABETH S. CHESTNEY
UNITED STATES MAGISTRATE JUDGE